## **Cleaning Up With SUCCESS**

**Utah OPS: Building on SUCCESS** 

# Case Studies in a Regulatory Environment Doug Hansen, DEQ



## The Team Approach

- Department and Division Director support
- Department SUCCESS
   Coordinator
- Division SUCCESS
   Coordinators





## **Department SUCCESS Committee**

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- Meet monthly
- Discuss common issues and challenges
- Vet project proposals
- Receive training
- Provide Division updates
- Cross pollination



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### Results



- 9 Systems in SMIS
- 1 System close
- Multiple improvement projects
  - Parking lot
  - Non-SUCCESS projects in process
  - Smaller or less quantifiable projects
- Quarterly report to Director

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## Underground Storage Tank (UST) Compliance Project



## **UST Compliance Background**



- Goal is to protect human health and environment by preventing leaks
- 4000 tanks at 1350 facilities
- Accomplished through:
  - Outreach
  - Compliance Verification
  - Enforcement



## **Finding Effective Measures**

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#### Challenges

- Measuring non-impact on health and environment
- How to count what didn't happen
- Hundreds of measures of compliance
- Key Measures
  - Compliance=Protection
  - Significant Operational Compliance (SOC)



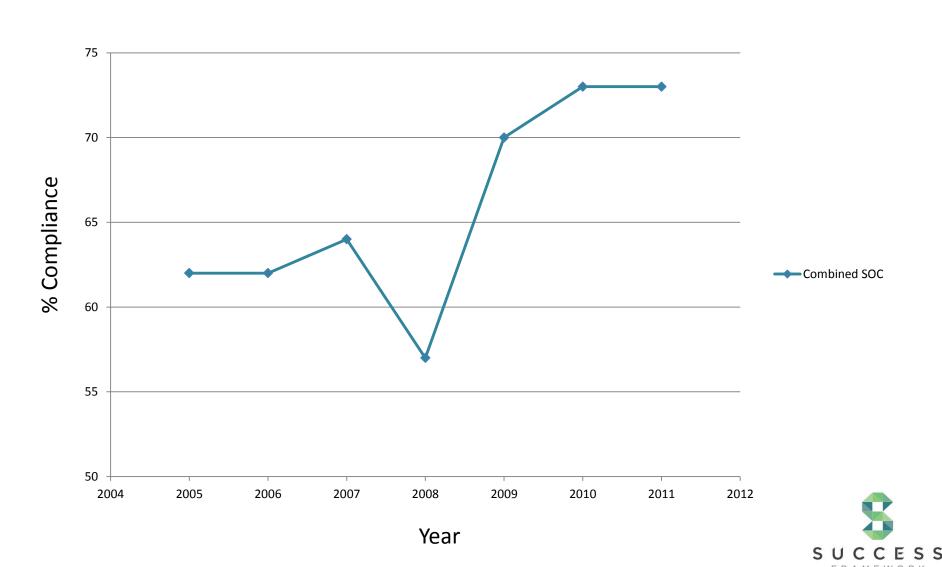


## Identifying Process Improvement Opportunities

- Effect of having a known measure (informal training)
- Reactive, not proactive, tank system operators
- Lack of knowledge
  - Requirements
  - Consequences
- Need for more formal training



### **Compliance Rates Through 2011**



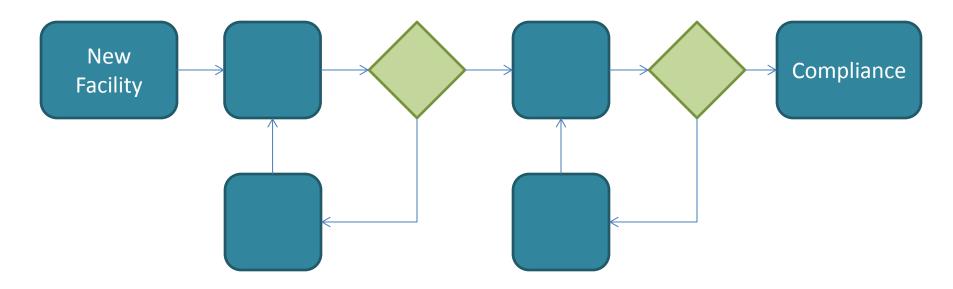
## **Adapting for SUCCESS**

- Identified project team
- Involved Department
   SUCCESS Coordinator
- Leaned heavily on GOMB representatives
- Formalized evaluation
- Added elements and language of SUCCESS Framework



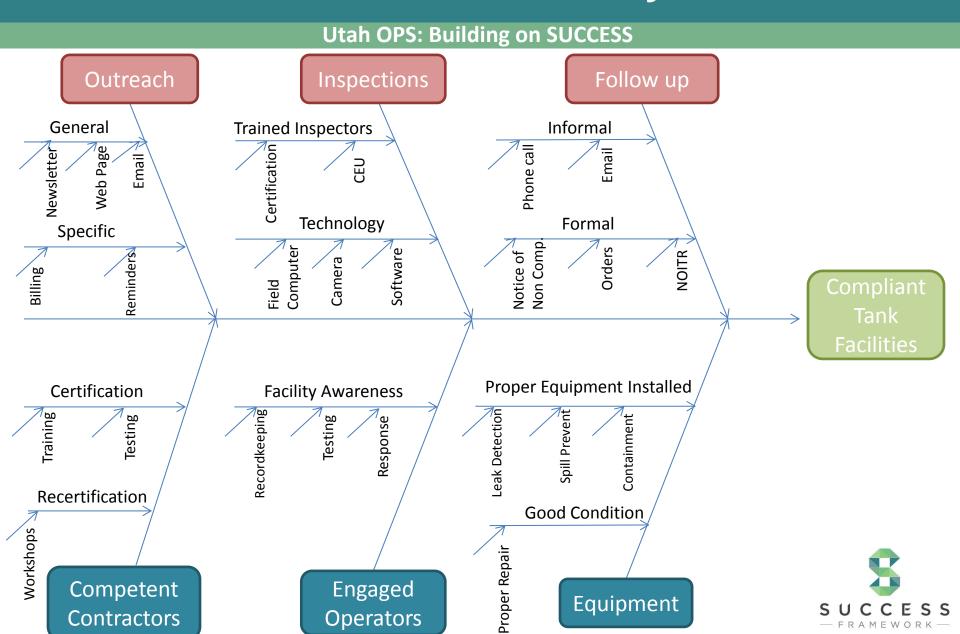


## Mapping the System What We Hope to See

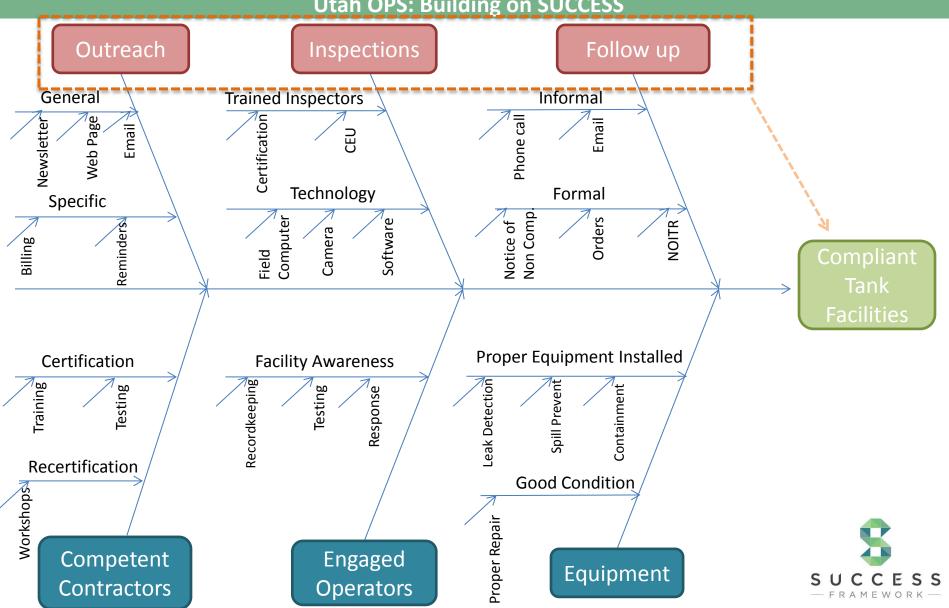




## **Non-Linear Reality**



## Simplifying the System (Drawing a Box)



## Applying the Language of SUCCESS

- Confirming Q
  - Most meaningful measure for the agency
  - Compliance rate
  - Where to measure in process
- Finding the right T
  - Inspections?
  - Represent the system
  - Big picture and big box
  - Number of facilities

- Identifying OE
  - Value of a "big box"
  - Unit codes dedicated to compliance
  - Function segregates charges of shared Unit
- Rolling year reporting
  - Seasonal inspections
  - Flatten spikes



UST Facility Compliance
Throughput Operating Strategy

<u>Goal</u>: Increase the percentage of UST Facilities in Compliance with SOC at the time of inspection.

Quality: Measure % of Facilities in SOC Compliance (rolling year).

Throughput: All UST Facilities (snapshot at end of quarter).

<u>OE</u>: Total budget spent from 4401, 4370, 4325, and 4360 (UST Staff).

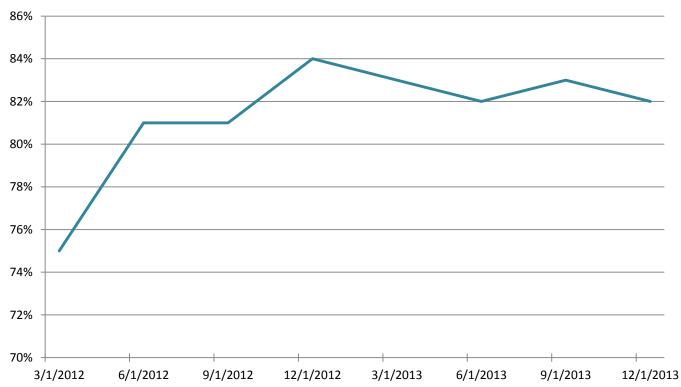


Proper Education, Outreach, Training and Assistance to Help Tank Owners Achieve Compliance Leak Prevention and Detection Requirements Met at Time of Inspection Facility Verified to be in Compliance, no Enforcement Necessary

## Results Through 2013

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#### **12-Month Compliance Rate**





## What if We Lift the Rug? (Watch the Bugs Scatter)

- Evaluate available data
  - Identify common violations
  - Evaluate reasons for violations
  - Develop outreach to address
- Implemented reminder letter in January 2014

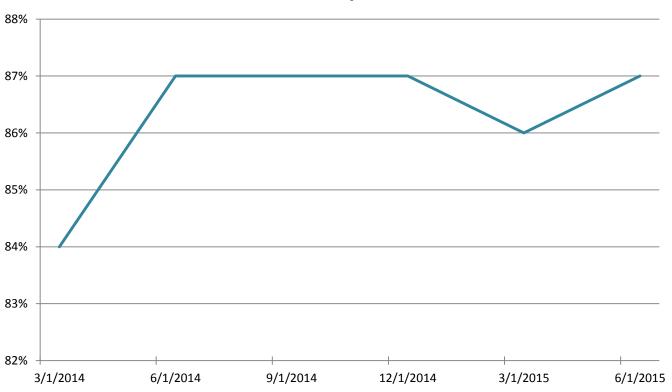




### **Current Results**

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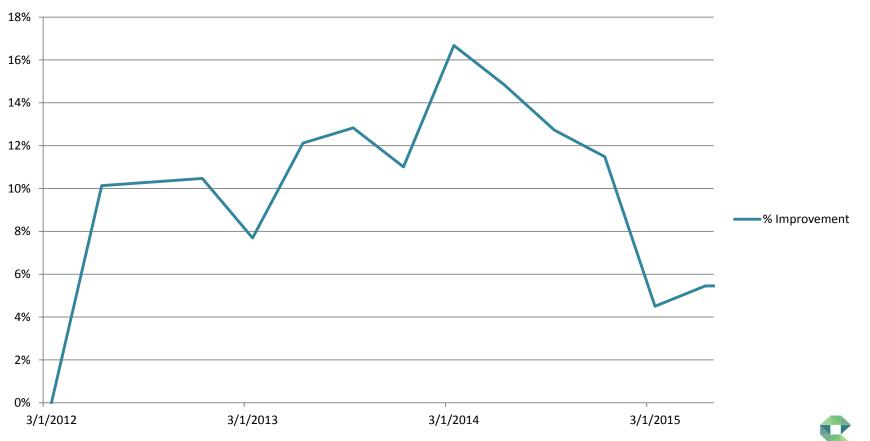
#### **12-Month Compliance Rate**





## QT/OE







## **Takeaways**

- Improvements initiated outside of SUCCESS can be adapted and implemented within the SUCCESS Framework
- If the classic understanding of SUCCESS measures doesn't apply, be creative
- Always ask "What next?"
- Dealing with changing metrics



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## **Voluntary Cleanup Program Project**



## Utah Barrel and Scrap VCP

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ArtSpace received a Certificate of Completion and constructed a mixed use facility. Approximately 35 permanent jobs were created.



## Former Simpson Steel VCP

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Cleanup of the former Simpson Steel site in Murray is helping revitalize the northern portion of this community.



## **Branch Challenges**

- Structural
  - Many systems within the Branch
  - Systems have small budgets
  - Projects driven by external pressures
  - Data collection and tracking
- Perceptual
  - We don't make widgets!
  - Our systems don't fit the model well



## A Focused Approach

- Map process common to multiple systems
- Evaluate pinch points and blue lights
- Determine meaningful measures
- Evaluate T, Q, and OE
  - Throughput issues



## **Site Investigation Process**



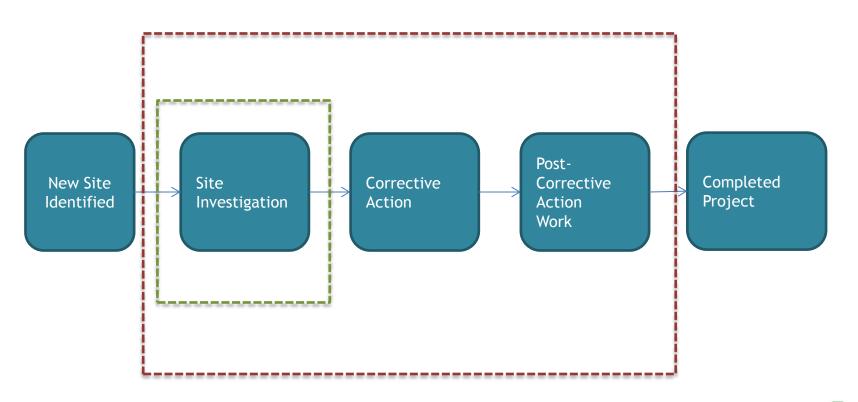


### Result of Narrow Focus

- Looked at numbers for VCP
- Quality easy to define
  - Needs of participants
  - Short, predictable review times
- OE resolution difficult
- Low Throughput



## **Expanding the Focus** (Draw a Bigger Box)





## Realities of the System

- Classic model would point to completed projects as measure
- System complexities
  - Technical
  - Legal
  - Stakeholder priorities
- Low Throughput numbers don't reflect true efforts



## Addressing the Throughput

- "Classic" consideration for T resulted in 3-5 throughputs annually
- GOMB input
- Defining the repeated process and associated deliverables
  - Staff involvement
- Identifying meaningful Throughput
  - Desk top deliverables
  - Site visits



## **Defining Quality**

- What do applicants care about?
  - Quick response
  - Certainty
- Capturing quality
  - Setting time goals
  - Accounting for quality field work
  - Staff input
- Weighting the quality measures



### The Formula

$$\frac{QT}{OE} = \frac{(w_d Q_d + w_f Q_f) \times T}{OE}$$

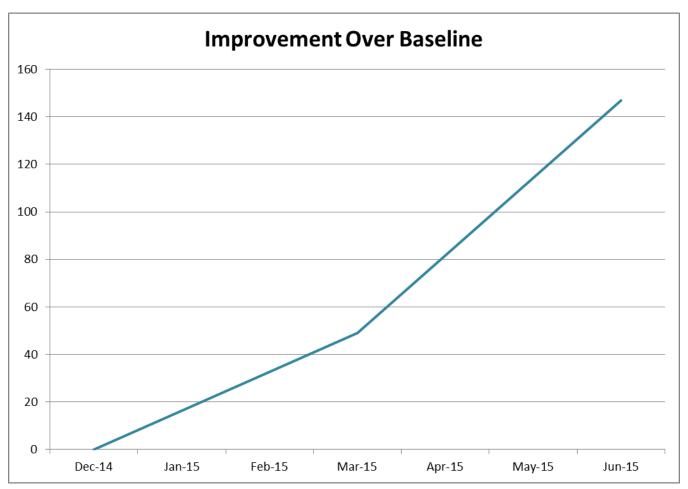


## **Getting Approval**

- OE very straightforward
- Involved GOMB early and throughout the process
- Clear process
- Justified measures
- Site visit



## **Preliminary Results**





## **Next Steps**

- Project
  - Tracking
  - Evaluation
  - Adjustments
- Program
  - Evaluate other systems
  - Incorporate lessons learned



## **Takeaways**

- Systems can be adapted to SUCCESS when they aren't "typical"
- Sometimes, you need to LOOK inside the box to THINK outside the box
- Data collection can be difficult up front
- GOMB input throughout the process is critical
  - Hands on experience provides perspective
  - Experience with other atypical systems

